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3	HRussell@wwhgd.com WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC			
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5	Telephone: (702) 938-3838			
6	Attorneys for Defendant Everest National Insurance Company			
7	UNITED STATES DISTRICT COURT			
8	DISTRICT OF NEVADA			
9	BEDROC LIMITED, LLC, a Nevada limited liability company,	Case No. 2:22-cv-01470-RFB-DJA		
10	Plaintiff,			
11	V/C	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO		
12	vs. EVEREST NATIONAL INSURANCE	COMPLAINT		
13	COMPANY, a Delaware corporation,	(SECOND REQUEST)		
14	Defendant.			

The Parties jointly stipulate that Defendant Everest National Insurance Company's time to respond to Plaintiff's Complaint is extended until Thursday, October 27, 2022. The current deadline to respond is October 17, 2022, and this is the second extension of time of Defendant's deadline to respond to the Complaint. Counsel for the parties are currently coordinating on the pending coverage issues, to determine whether the disputed issues in this action can be resolved or narrowed. An additional brief extension will therefore allow those discussions to continue in advance of responsive pleadings.

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IT IS SO STIPULATED, this 17th day of October, 2022.

The Parties hereto preserve and do not waive any objections or defenses by this Stipulation.

## 1

/s/ Howard J. Russell

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/s/ Jessica M. Lujan

F. Thomas Edwards, Esq. Jessica M. Lujan, Esq. HOLLEY DRIGGS 300 South Fourth Street, Suite 1600

Attorneys for Plaintiff

IT IS SO ORDERED:

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: October 18, 2022